

In making the rejection, the Examiner relies on Morita to show a machine-readable medium having instructions that when executed by a processor cause the step of associating first image data (Col. 8, lines 11-12) and the first method (e.g., image processing application 54) as part of an image object (e.g., image processing object 55) for being executed by an abstract machine (e.g., CPU 2) to obtain first translated image data (Col. 6, lines 17-19) based upon the first image (e.g., Col. 8, lines 14-20).

In response, Applicant respectfully disagrees with the Examiner's interpretation of Morita. First, the Examiner characterizes image processing application 54 as a method, which is part of an image object. However, only a cursory review of Morita shows that image processing applications 54 are distinct entities and cannot be reasonably interpreted as part of the image processing objects 55 (Figure 7; Col. 8, lines 9-42). Thus, Morita's image processing applications cannot be properly considered to represent a method of an object, as recited in Applicant's independent claims.

Moreover, Morita fails to disclose any translated image data, as recited in Applicant's independent claims. Rather, Morita discusses the conversion of client-form requests into standard-form requests that are readable by an Object Request Broker ("ORB") (Col. 6, lines 12-19). The standard-form request is merely a form of request that can be properly transmitted or received by the ORB of the client and the servers (Col. 8, lines 30-34). Once received by the appropriate server, the standard-form request can be converted into a server-form request in order to complete a function on the server (Col. 9, lines 1-8).

Thus, Morita discusses the translation of requests (e.g., which are not the same as image data) from a form that is compatible to the clients, to a form that is suitable for transmission over a local area network, to a final form that is compatible with a server. This proposition is supported by the fact that Morita describes the overall system of using image processing objects to include a common access interface for image processing units (emphasis added). Such a scheme is utilized when processing units provide a substantially identical service and have different specifications. For example, when two servers each have a printer unit, the printer units provide a substantially identical service, but the specification of each printer unit may be different from each other. In such

a case, image processing objects of these servers include common access interfaces for the printer units (Col. 10, lines 7-17). Thus, the entire goal of Morita is to overcome certain hardware and operational constraints that may be particular to each client and/or server, which is not the same as obtaining translated image data, as recited in Applicant's independent claims.

Accordingly, Applicant respectfully requests withdrawal of the rejection of independent Claims 1, 5, 7, 10 and 20. Claims 2-4, 6, 8, 9, 11-14, 16-19 and 21 respectively depend from independent Claims 1, 5, 7, 10 and 20. Therefore, each of the dependent claims is not anticipated at least for the same reasons as their respective independent claims.

## II. Claims Rejected Under 35 U.S.C. §103(a)

The Examiner rejects Claim 15 under 35 U.S.C. 103(a) as being obvious over Morita in view of U.S. Patent No. 6,215,495 to Grantham, et al. ("Grantham"). Applicant respectfully traverses this rejection.

In order to render a claim obvious, the relied upon references must teach or suggest every limitation of the claim such that the invention as a whole would have been obvious at the time the invention was made to one skilled in the art. Claim 15 is indirectly dependent on independent Claim 10 and contains all of the limitations thereof. Thus, all of the arguments and reasoning set forth above regarding Claim 10 apply equally here to Claim 15.

Specifically, Morita fails to teach or suggest an image object having image data and an associated method that, when executed upon the image data by an abstract machine, yields translated image data (emphasis added), as recited in Claim 15. Grantham fails to cure this deficiency of Morita. Therefore, at least this limitation is neither taught nor suggested by the cited references in combination.

Accordingly, Applicant respectfully requests withdrawal of the rejection of Claim 15.

## CONCLUSION

In view of the foregoing, it is believed that all claims now pending (1) are in proper form, (2) are neither obvious nor anticipated by the relied upon art of record, and (3) are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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### CERTIFICATE OF MAILING:

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Box Non-Fee Amendment, Assistant Commissioner for Patents, Washington, D.C. 20231, on February 24, 2003.

Lillian E. Rodriguez 2-24-03  
Lillian E. Rodriguez February 24, 2003